

The Law of Offices of Tom Chia-Kai Wang
Tom Chia-Kai Wang (SBN 269050)
117 West 9th St., Suite 206
Los Angeles, CA 90015
Telephone: (213) 290-0930
Facsimile: (213) 622-0335

Attorneys for Defendants Chetan Narsude, Mani
Kulasooriya, Monvia LLC and New Moon LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SUZANNE D. JACKSON,

Plaintiff,

v.

WILLIAM FISCHER; JON SABES;
STEVEN SABES; DAVID
GOLDSTEEN; MARVIN SIEGEL;
BRIAN CAMPION; LONNIE
BROOKBINDER; CHETAN
NARSUDE; MANI KULASOORIYA;
JOSHUA ROSEN; UPPER ORBIT,
LLC; SPECIGEN, INC.; PEER
DREAMS INC.; NOTEBOOKZ INC.;
ILEONARDO.COM INC.; NEW
MOON LLC; MONVIA LLC; and
SAZANI BEACH HOTEL,

Defendants.

Case No. 3:11-cv-02753-JSW

**STIPULATION AND ~~PROPOSED~~
ORDER GRANTING LEAVE TO
EXCEED PAGE LIMITS
ESTABLISHED BY THE COURT'S
CIVIL STANDING ORDERS**

1 Plaintiff Suzanne Jackson and Defendants Chetan Narsude, Mani Kulasooriya,
 2 Monvia LLC and New Moon LLC (collectively "Defendants"), by and through their
 3 counsel, and subject to the Court's approval, stipulate as follows:

4 **WHEREAS**, Plaintiff filed a First Amended Complaint ("FAC") on December 5,
 5 2011;

6 **WHEREAS**, the FAC asserts purported federal securities fraud and common law
 7 claims related to Plaintiff's investments;

8 **WHEREAS**, the FAC alleges, *inter alia*, that Defendants engaged in a
 9 comprehensive scheme to defraud Plaintiff in violation of the Securities Exchange Act of
 10 1934 and the Securities Act of 1933 and by failing to provide and failing to disclose
 11 material facts, which purportedly constitute common law fraud;

12 **WHEREAS**, the parties agree that the FAC's scope and complexity warrant a
 13 modest increase in the page limits imposed by this Court's Civil Standing Orders for
 14 Defendants' opening brief and Plaintiff's opposition brief to Defendants' motion to
 15 dismiss, but that the page limit for Defendants' reply brief shall remain 15 pages;

16 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY**
 17 **AND BETWEEN THE PARTIES**, subject to the Court's approval, that:

- 18 1. Defendants' memorandum of law in support of their motion to dismiss shall not
 19 exceed 25 pages; and
- 20 2. Plaintiff's memorandum of law in opposition to Defendants' motion to dismiss
 21 shall not exceed 25 pages.

22
 23 Dated: January 4, 2012

KAUFMAN LLC

24
 25 By: /s/ Alan H. Kaufman

26 Alan H. Kaufman

27 Attorneys for Plaintiff Suzanne D. Jackson
 28

1 Dated: January 4, 2012

THE LAW OFFICES OF TOM CHIA-KAI WANG

2
3 By: /s/ Tom Chia Kai Wang

4 Tom Chia Kai Wang

5 Attorneys for Defendants Chetan Narsude, Mani
6 Kulasooriya, Monvia LLC and New Moon LLC
7

~~PROPOSED~~ ORDER

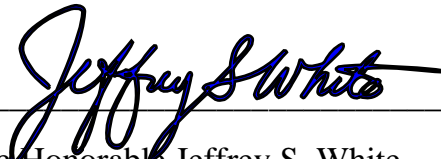
Having reviewed the above stipulation, **IT IS HEREBY ORDERED** that the page limits for the motion to dismiss briefing in this matter shall be:

Defendants' motion to dismiss: 25 pages

Plaintiff's opposition to Defendants' motion to dismiss 25 pages

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: January 5, 2012



The Honorable Jeffrey S. White
United States District Judge